

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Renee Curtis-Carey a/k/a Renee Curtis  
Debtor,

PHH Mortgage Corporation as servicer for  
Deutsche Bank National Trust Company, as  
Trustee for Morgan Stanley Dean Witter  
Capital I Inc. Trust 2003-NC2, Mortgage Pass-  
Through Certificates, Series 2003-NC2  
Movant.

v.

Renee Curtis-Carey a/k/a Renee Curtis  
Debtor/Respondent,

Scott Waterman, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
16-17392-amc

CHAPTER 13

**RESPONSE OF PHH MORTGAGE CORPORATION AS SERVICER FOR DEUTSCHE  
BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR MORGAN STANLEY  
DEAN WITTER CAPITAL I INC. TRUST 2003-NC2, MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2003-NC2 TO DEBTOR'S MOTION TO HOLD PHH  
MORTGAGE CORPORATION IN CONTEMPT OF COURT**

PHH Mortgage Corporation as servicer for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2, by and through its counsel, LOGS Legal Group LLP, hereby responds to Debtor's Motion to Hold PHH Mortgage Corporation in Contempt of Court, and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. No response required; the document speaks for itself.
6. Admitted.
7. Admitted.

8. Admitted.

9. Denied. It is denied that the sending of the statement with the error was willful, but instead, erroneous.

10. Admitted.

11. Admitted.

12. It is denied that the error was willful.

13. It is admitted the Court has such power. By way of further response, counsel for Movant is pending settlement authority from her client to address the attorneys fees incurred by the Debtor in this matter.

WHEREFORE, PHH Mortgage Corporation as servicer for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2 respectfully requests that confirmation of the Debtor's Motion to Hold PHH Mortgage Corporation in Contempt of Court be dismissed/denied insofar as finding willful violation and contempt.

Respectfully submitted,

/s Kristen D. Little

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Kristen D. Little 79992  
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**CERTIFICATE OF SERVICE**

I, Kristen D. Little an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of the foregoing by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this January 21, 2022:

Renee Curtis-Carey a/k/a Renee Curtis  
7827 Temple Road  
Philadelphia, PA 19150

Alfonso G. Madrid, Esquire, Community Legal Services of Philadelphia  
North Philadelphia Law Center  
1410 W. Erie Avenue  
Philadelphia, PA 19140  
amadrid@clsphila.org - VIA ECF

Scott Waterman, Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Avenue, Suite 100  
Reading, PA 19606  
ecfmail@reecadingch13.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Kristen D. Little

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Christopher A. DeNardo 78447

Kristen D. Little 79992

Lily C. Calkins 327356

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